

Jessica L. Blome (State Bar No. 314898)
Lily A. Rivo (State Bar No. 242688)
GREENFIRE LAW, PC
2748 Adeline Street, Suite A
Berkeley, CA 94703
Ph/Fx: (510) 900-9502
Email: jblome@greenfirelaw.com
lrivero@greenfirelaw.com

Attorneys for Plaintiff Deniz Bolbol

JOSEPH P. CUVIELLO
205 De Anza Blvd., #125
San Mateo, CA 94402
Telephone: (650) 315-3776
Email: pcuvie@gmail.com

Plaintiff in pro per

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

JOSEPH P. CUVIELLO and DENIZ
BOLBOL, individually,

PLAINTIFFS.

v.

ROWELL RANCH RODEO, INC.;
HAYWARD AREA RECREATION AND
PARK DISTRICT; HAYWARD AREA
RECREATION AND PARK DISTRICT
PUBLIC SAFETY MANAGER/RANGER
KEVIN HART; ALAMEDA COUNTY
SHERIFF'S OFFICE; ALAMEDA
COUNTY DEPUTY SHERIFF JOSHUA
MAYFIELD; and DOES 1 and 2, in their
individual and official capacities, jointly and
severally,

DEFENDANTS.

Case No. 3:23-cv-01652-VC

**SUPPLEMENTAL DECLARATION
OF JESSICA L. BLOME IN
SUPPORT OF PLAINTIFF DENIZ
BOLBOL'S REPLY IN SUPPORT OF
PLAINTIFF'S MOTION FOR
SANCTIONS**

Judge: Hon. Kandis A. Westmore
Dept: Courtroom 5 – 17th Floor
Hearing Date: May 2, 2024
Hearing Time: 1:30 p.m., Zoom

1 I, Jessica L. Blome, do declare and state:

2 1. I am an attorney at law duly licensed to practice before the United States
3 District Court for the Northern District of California, and all the Courts of the State of
4 California. I am a shareholder and partner for Greenfire Law, PC, counsel of record for
5 Plaintiff Deniz Bolbol (Bolbol). If sworn as a witness, I could and would testify to my
6 personal knowledge of the facts set forth herein. I am submitting this supplemental declaration
7 in support of Bolbol's Motion for Sanctions.

8 2. In good faith, I revised my fee calculation to omit entries for the work of which
9 the Rodeo complains. These omissions did not alter her fee calculation, though, because I
10 initially cut my fee request by \$11,507, to reflect billing judgment. As such, Plaintiff's initial
11 request of \$45,000 in compensatory damages for attorneys' fees and costs incurred as a result
12 of the Rodeo's bad faith discovery misconduct stands. Attached hereto as **Exhibit N** is a true
13 and correct copy of revised detailed time records for Greenfire Law, PC for otherwise
14 unnecessary expenses, including attorney fees, that were directly caused by the conduct of
15 defendant Rowell Ranch Rodeo, Inc. Omissions are indicated in yellow.

16 3. In its opposition brief, Dkt. 78, p. 5, Rowell Ranch Rodeo intimates that
17 Plaintiff Bolbol withdrew her deposition notices to Defendants Gary Houts, Deputy Joshua
18 Mayfield, and Hayward Area Recreation and Park Ranger Kevin Hart because Plaintiff
19 believes it this act to be one of contrition. Nothing is further from the truth. Plaintiff needed
20 the depositions of these individuals only to disprove the Rodeo's false statement in discovery
21 that Mr. Houts did not call law enforcement. Once the Rodeo admitted it called law
22 enforcement in its supplemental discovery responses, those depositions became unnecessary.

23 4. In addition, Rowell Ranch Rodeo submitted an affidavit in connection with its
24 opposition papers, claiming it provided Mr. Houts's phone number to Alameda County
25 Counsel on March 18, 2024, to aid the County in its search of County dispatch records. Dkt.
26 78-1, ¶ 4. Plaintiff has no way of verifying the veracity of this representation, but I know I am
27 the person who provided Mr. Houts's phone number to County counsel during a phone call on
28 March 14 because County counsel thanked me for providing his phone number by letter on

1 March 15. *See* Dkt. 77-1, Exh. F, ¶ 1. The County supplemented its discovery responses on
2 March 20, 2024. *Id.* at Exh. G.

3
4
5
6
7 I make this declaration under penalty of perjury under the laws of the United States of
8 America, executed this 7th day of March 2024 in Berkeley, California.

9
10 By: /s/ Jessica L. Blome
Jessica L. Blome
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Exhibit N

Date	Hours	Activity category	UTBMS task code	Description	Rate (\$)	Billable (\$)	User
08/21/2023	0.2	A104 Review/analyze L390 Other Discovery	L390 Other Discovery	Download, review, and process Rowell Ranch discovery responses	\$ 720.00	\$ 144.00	Jessica Blome
08/21/2023	0.5	A104 Review/analyze L390 Other Discovery	L390 Other Discovery	Review Deniz Bolbol's draft responses to RRR's first set of interrogatories	\$ 720.00	\$ 360.00	Jessica Blome
08/21/2023	0.5	A103 Draft/revise L310 Written Discovery	L310 Written Discovery	Revise draft discovery to HARD, set one	\$ 720.00	\$ 360.00	Jessica Blome
08/21/2023	0.4	A103 Draft/revise L310 Written Discovery	L310 Written Discovery	Revise draft written discovery to HARD, County	\$ 720.00	\$ 288.00	Jessica Blome
08/22/2023	0.3	A104 Review/analyze L310 Written Discovery	L310 Written Discovery	Review, finalize draft written responses to RRR discovery, set one, send to client for approval and instruction for collecting documents for production	\$ 720.00	\$ 216.00	Jessica Blome
08/22/2023	0.1	A103 Draft/revise L310 Written Discovery	L310 Written Discovery	Exchange emails with DW re: questions about draft discovery to County	\$ 720.00	\$ 72.00	Jessica Blome
08/25/2023	0.1	A106 Communicate (with client) L390 Other Discovery	L390 Other Discovery	Exchange emails with Pat C. re: draft responses to RRR roggs, set 1	\$ 720.00	\$ 72.00	Jessica Blome
08/25/2023	0.1	A105 Communicate (in firm) L310 Written Discovery	L310 Written Discovery	Review email from JB to DW regarding preparing discovery responses and JB	\$ 500.00	\$ 50.00	Lily Rivo
08/25/2023	0.1	A106 Communicate (with client) L390 Other Discovery	L390 Other Discovery	Confer with clients, associate re: need for phone records	\$ 720.00	\$ 72.00	Jessica Blome
09/01/2023	0.1	A107 Communicate (other outside counsel) L390 Other Discovery	L390 Other Discovery	Review correspondence from County and confirm receipt of all produced body cam footage in response to RPD	\$ 500.00	\$ 50.00	Lily Rivo
09/01/2023	0.2	A110 Manage data/files L310 Written Discovery	L310 Written Discovery	Download, manage Country production of written discovery	\$ 500.00	\$ 100.00	Lily Rivo
09/05/2023	0.1	A105 Communicate (in firm) L310 Written Discovery	L310 Written Discovery	Confer with JB regarding discovery responses and written discovery propounded	\$ 500.00	\$ 50.00	Lily Rivo
09/05/2023	0.1	A105 Communicate (in firm) L310 Written Discovery	L310 Written Discovery	Confer with LR regarding discovery responses and written discovery propounded	\$ 720.00	\$ 72.00	Jessica Blome
09/05/2023	0.4	A106 Communicate (with client) L310 Written Discovery	L310 Written Discovery	Exchange emails with client, P. Cuvillo re: meet and confer topics for RRR and ACSO	\$ 720.00	\$ 288.00	Jessica Blome
09/07/2023	0.1	A106 Communicate (with client) L310 Written Discovery	L310 Written Discovery	Review HARD email request for extension to respond to discovery, email client re: same	\$ 720.00	\$ 72.00	Jessica Blome
09/07/2023	0.9	A103 Draft/revise L160 Settlement/Non-Binding ADR	L160 Settlement/Non-Binding ADR	Draft settlement offer, send to clients for review/comment	\$ 720.00	\$ 648.00	Jessica Blome
09/07/2023	0.2	A106 Communicate (with client) L160 Settlement/Non-Binding ADR	L160 Settlement/Non-Binding ADR	Exchange emails with client re: edits to draft settlement offer	\$ 720.00	\$ 144.00	Jessica Blome
09/07/2023	0.1	A103 Draft/revise L160 Settlement/Non-Binding ADR	L160 Settlement/Non-Binding ADR	Revise draft settlement offer to incorporate client comments	\$ 720.00	\$ 72.00	Jessica Blome
09/08/2023	0.2	A104 Review/analyze L160 Settlement/Non-Binding ADR	L160 Settlement/Non-Binding ADR	Review settlement offer, email JB re edits	\$ 500.00	\$ 100.00	Lily Rivo
09/08/2023	0.1	A107 Communicate (other outside counsel) L160 Settlement/Non-Binding ADR	L160 Settlement/Non-Binding ADR	Final edits to settlement offer and transmit to counsel	\$ 500.00	\$ 50.00	Lily Rivo
09/11/2023	0.5	A103 Draft/revise L390 Other Discovery	L390 Other Discovery	Draft and send out meet and confer letter over interrogatory responses to RRR	\$ 720.00	\$ 360.00	Jessica Blome

Exhibit N

09/12/2023	0.1	A108 Communicate (other external) L390 Other Discovery	L390 Other Discovery	Exchange emails with ACSO attorney re: meet and confer over discovery	\$ 720.00	\$ 72.00	Jessica Blome
09/14/2023	0.1	A106 Communicate (with client) L310 Written Discovery	L310 Written Discovery	Review JB correspondence to client regarding discovery responses to ASCO, timing	\$ 500.00	\$ 50.00	Lily Rivo
09/14/2023	0.1	A108 Communicate (other external) L310 Written Discovery	L310 Written Discovery	Exchange emails with P. Cuvillo regarding responses to ACSO discovery	\$ 720.00	\$ 72.00	Jessica Blome
09/21/2023	0.1	A104 Review/analyze L310 Written Discovery	L310 Written Discovery	Review communication with clients regarding upcoming discovery response to ASCO on 10/2	\$ 500.00	\$ 50.00	Lily Rivo
09/21/2023	0.1	A106 Communicate (with client) L390 Other Discovery	L390 Other Discovery	Review County's request for extension to respond to discovery, send client recommendation re: same	\$ 720.00	\$ 72.00	Jessica Blome
09/21/2023	0.1	A104 Review/analyze L310 Written Discovery	L310 Written Discovery	Review emails from clients confirming ACSO extension of deadline to respond to discovery	\$ 500.00	\$ 50.00	Lily Rivo
09/21/2023	0.1	A108 Communicate (other external) L310 Written Discovery	L310 Written Discovery	Exchange emails with client, P. Cuvillo re: extending deadline for ACSO to respond to discovery	\$ 720.00	\$ 72.00	Jessica Blome
09/21/2023	0.1	A108 Communicate (other external) L310 Written Discovery	L310 Written Discovery	Exchange emails with counsel for ACSO responding to request for extension to serve responses to discovery	\$ 720.00	\$ 72.00	Jessica Blome
09/21/2023	0.1	A108 Communicate (other external) L310 Written Discovery	L310 Written Discovery	Further exchange of emails with ACSO counsel re: discovery deadlines	\$ 720.00	\$ 72.00	Jessica Blome
09/28/2023	0.3	A108 Communicate (other external) L390 Other Discovery	L390 Other Discovery	Meet and confer call with ACSO's counsel	\$ 720.00	\$ 216.00	Jessica Blome
09/28/2023	0.1	A106 Communicate (with client) L390 Other Discovery	L390 Other Discovery	Email update to clients after call with Marc Brainich	\$ 720.00	\$ 72.00	Jessica Blome
10/05/2023	0.1	A106 Communicate (with client) L310 Written Discovery	L310 Written Discovery	Exchange emails with client regarding responses to ACSO discovery	\$ 720.00	\$ 72.00	Jessica Blome
10/05/2023	0.1	A108 Communicate (other external) L310 Written Discovery	L310 Written Discovery	Exchange emails with ACSO counsel re: discovery responses	\$ 720.00	\$ 72.00	Jessica Blome
10/05/2023	0.2	A106 Communicate (with client) L390 Other Discovery	L390 Other Discovery	Review client email with review of bodycam footage	\$ 720.00	\$ 144.00	Jessica Blome
10/05/2023	0.1	A108 Communicate (other external) L390 Other Discovery	L390 Other Discovery	Follow up with RRR counsel on 9/11 meeting and confer letter re: phone logs	\$ 720.00	\$ 72.00	Jessica Blome
10/05/2023	0.1	A108 Communicate (other external) L390 Other Discovery	L390 Other Discovery	Write to opposing counsel for RRR and ACSO to follow up on meet and confer efforts over discovery production	\$ 720.00	\$ 72.00	Jessica Blome
10/05/2023	0.1	A105 Communicate (in firm) L160 Settlement/Non-Binding ADR	L160 Settlement/Non-Binding ADR	Exchange emails with PC re: drafting settlement conference statement	\$ 720.00	\$ 72.00	Jessica Blome
10/05/2023	0.1	A108 Communicate (other external) L310 Written Discovery	L310 Written Discovery	Exchange emails with ACSO re: extension of discovery response deadline	\$ 720.00	\$ 72.00	Jessica Blome
10/06/2023	0.4	A104 Review/analyze L160 Settlement/Non-Binding ADR	L160 Settlement/Non-Binding ADR	Review HARD's settlement conference statement, respond with offer to provide attorneys' fee worksheet	\$ 720.00	\$ 288.00	Jessica Blome
10/10/2023	0.1	A106 Communicate (with client) L160 Settlement/Non-Binding ADR	L160 Settlement/Non-Binding ADR	Review email from Rowell Ranch transmitting settlement conference statements, email client re: same	\$ 720.00	\$ 72.00	Jessica Blome

Exhibit N

10/10/2023	0.2	A104 Review/analyze L250 Other Written Motions and Submissions	L250 Other Written Motions and Submissions	Review and process ACSO settlement conference statement, send to client	\$ 720.00	\$ 144.00	Jessica Blome
10/10/2023	0.3	A103 Draft/revise L160 Settlement/Non-Binding ADR	L160 Settlement/Non-Binding ADR	Revise/finalized draft settlement conference statement	\$ 720.00	\$ 216.00	Jessica Blome
10/10/2023	0.1	A105 Communicate (in firm) L160 Settlement/Non-Binding ADR	L160 Settlement/Non-Binding ADR	Email DW with instructions for preparing and serving the settlement conference statement	\$ 720.00	\$ 72.00	Jessica Blome
10/10/2023	0.1	A106 Communicate (with client) L160 Settlement/Non-Binding ADR	L160 Settlement/Non-Binding ADR	Email client re: final edits to settlement conference statement	\$ 720.00	\$ 72.00	Jessica Blome
10/10/2023	0.1	A106 Communicate (with client) P500 Negotiation/Revision/Responses	P500 Negotiation/Revision/Responses	Exchange emails with client re: settlement conference	\$ 720.00	\$ 72.00	Jessica Blome
10/10/2023	0.2	A104 Review/analyze L160 Settlement/Non-Binding ADR	L160 Settlement/Non-Binding ADR	Review settlement conference statement to ensure hyperlinks work, formatting matches, it's ready to file	\$ 720.00	\$ 144.00	Jessica Blome
10/12/2023	0.8	A106 Communicate (with client) L160 Settlement/Non-Binding ADR	L160 Settlement/Non-Binding ADR	Pre-meeting with clients in advance of settlement conference	\$ 720.00	\$ 576.00	Jessica Blome
10/12/2023	0.1	A108 Communicate (other external) L310 Written Discovery	L310 Written Discovery	Email ACSO to follow up about sending discovery requests in Word	\$ 720.00	\$ 72.00	Jessica Blome
10/12/2023	0.1	A104 Review/analyze L310 Written Discovery	L310 Written Discovery	Review and process ACSO's discovery to plaintiffs in Word	\$ 720.00	\$ 72.00	Jessica Blome
10/13/2023	0.1	A106 Communicate (with client) L310 Written Discovery	L310 Written Discovery	Exchange emails with client transmitting discovery responses from County	\$ 500.00	\$ 50.00	Lily Rivo
10/16/2023	0.1	A104 Review/analyze L310 Written Discovery	L310 Written Discovery	Calendar discovery deadline extension to 11/18/23	\$ 150.00	\$ 15.00	Donna Wallace
10/17/2023	0.1	A105 Communicate (in firm) L310 Written Discovery	L310 Written Discovery	Confer with LR re: plan for review/finalizing discovery responses to ACSO	\$ 720.00	\$ 72.00	Jessica Blome
10/17/2023	0.1	A105 Communicate (in firm) L310 Written Discovery	L310 Written Discovery	Confer with JB re: plan for review/finalizing discovery responses to ACSO	\$ 500.00	\$ 50.00	Lily Rivo
10/18/2023	1	A104 Review/analyze L310 Written Discovery	L310 Written Discovery	Review discovery responses to written discovery propounded by County, incorporate edits, submit to JB for final review	\$ 500.00	\$ 500.00	Lily Rivo
10/18/2023	0.2	A103 Draft/revise L310 Written Discovery	L310 Written Discovery	Review LR's proposed revisions to discovery responses, confer with her re: getting client approval for proposed changes	\$ 720.00	\$ 144.00	Jessica Blome
10/18/2023	0.4	A103 Draft/revise L310 Written Discovery	L310 Written Discovery	Incorporate changes to discovery per JB edits, draft email to clients submitting changes.	\$ 500.00	\$ 200.00	Lily Rivo
10/18/2023	0.1	A105 Communicate (in firm) L310 Written Discovery	L310 Written Discovery	Exchange emails with LR re: further edits to discovery responses to ACSO	\$ 720.00	\$ 72.00	Jessica Blome
10/18/2023	0.3	A103 Draft/revise L310 Written Discovery	L310 Written Discovery	Finalize edits to RFAs per JB comments and send to client for verification.	\$ 500.00	\$ 150.00	Lily Rivo
10/18/2023	0.1	A106 Communicate (with client) L310 Written Discovery	L310 Written Discovery	Review ACSO's request for additional extension re: discovery, confer with client re: same	\$ 720.00	\$ 72.00	Jessica Blome
10/18/2023	0.1	A106 Communicate (with client) L310 Written Discovery	L310 Written Discovery	Exchange emails with client re: County's request for additional time to respond to discovery	\$ 720.00	\$ 72.00	Jessica Blome
10/18/2023	0.1	A108 Communicate (other external) L310 Written Discovery	L310 Written Discovery	Respond to ACSO's request for extension to respond to discovery	\$ 720.00	\$ 72.00	Jessica Blome

Exhibit N

10/18/2023	0.3	A106 Communicate (with client) L310 Written Discovery	L310 Written Discovery	Review email exchange regarding discovery responses between clients and JB	\$ 500.00	\$ 150.00	Lily Rivo
10/18/2023	0.1	A106 Communicate (with client) L310 Written Discovery	L310 Written Discovery	Exchange emails with client re: edits to discovery responses to County discovery	\$ 720.00	\$ 72.00	Jessica Blome
10/18/2023	0.1	A105 Communicate (in firm) L310 Written Discovery	L310 Written Discovery	Confer with DW regarding RFAs, edits and verification page	\$ 500.00	\$ 50.00	Lily Rivo
10/18/2023	0.1	A105 Communicate (in firm) L310 Written Discovery	L310 Written Discovery	Confer with LR regarding RFAs, edits and verification page	\$ 150.00	\$ 15.00	Donna Wallace
10/18/2023	0.3	A103 Draft/revise L310 Written Discovery	L310 Written Discovery	Finalize discovery and serve	\$ 150.00	\$ 45.00	Donna Wallace
10/18/2023	0.1	A105 Communicate (in firm) L310 Written Discovery	L310 Written Discovery	Exchange emails with client, staff to finalize language in RFAs for County	\$ 720.00	\$ 72.00	Jessica Blome
10/18/2023	0.3	A104 Review/analyze L310 Written Discovery	L310 Written Discovery	Final review of all written discovery propounded by the County for DW to send	\$ 500.00	\$ 150.00	Lily Rivo
10/30/2023	0.6	A104 Review/analyze L310 Written Discovery	L310 Written Discovery	Review ACSO response to Plaintiffs' ROGs	\$ 500.00	\$ 300.00	Lily Rivo
10/30/2023	0.2	A104 Review/analyze L310 Written Discovery	L310 Written Discovery	Review correspondence and discovery propounded by Pat for Rowell Ranch	\$ 500.00	\$ 100.00	Lily Rivo
10/31/2023	0.2	A105 Communicate (in firm) L310 Written Discovery	L310 Written Discovery	Prepare instructions for second round discovery, send to associate	\$ 720.00	\$ 144.00	Jessica Blome
11/06/2023	1.6	A103 Draft/revise L310 Written Discovery	L310 Written Discovery	Review discovery, complaint, draft meet and confer letter for ACSO	\$ 500.00	\$ 800.00	Lily Rivo
11/07/2023	0.6	A103 Draft/revise L310 Written Discovery	L310 Written Discovery	Finalize edits to meet and confer letter per Pat's email, review County responses to quote appropriately and incorporate language.	\$ 500.00	\$ 300.00	Lily Rivo
11/07/2023	0.5	A103 Draft/revise L310 Written Discovery	L310 Written Discovery	Draft Deniz's Second Set of Interrogatories and RFP to Rowell Ranch, editing appropriately and updating description of Doe Defendant 1	\$ 500.00	\$ 250.00	Lily Rivo
11/08/2023	0.7	A103 Draft/revise L310 Written Discovery	L310 Written Discovery	Draft final edits to Meet and Confer letter, and update Deniz's ROGs and RFPs for client review.	\$ 500.00	\$ 350.00	Lily Rivo
11/08/2023	0.7	A103 Draft/revise L310 Written Discovery	L310 Written Discovery	Format and update discovery drafts for RFP, RFA, and ROGS to Rowell Ranch, send to client for review	\$ 500.00	\$ 350.00	Lily Rivo
11/08/2023	0.1	A105 Communicate (in firm) L310 Written Discovery	L310 Written Discovery	Exchange emails with LR re: status of discovery with ACSO	\$ 720.00	\$ 72.00	Jessica Blome
11/08/2023	0.1	A106 Communicate (with client) L310 Written Discovery	L310 Written Discovery	Draft email exchange and send Meet and Confer letter and draft Discovery to clients, Deniz's RFP and ROGS to RRR, Set Two	\$ 500.00	\$ 50.00	Lily Rivo
11/08/2023	0.4	A103 Draft/revise L310 Written Discovery	L310 Written Discovery	Review HARD responses to discovery in response to Pat request for more documentation; draft edits to Deniz's RFP and ROGS, reviewing definitions and updating accordingly	\$ 500.00	\$ 200.00	Lily Rivo
11/08/2023	1.1	A103 Draft/revise L310 Written Discovery	L310 Written Discovery	Draft request for admissions, update the ROGs and RFPs, Set Two, for submission to RRR	\$ 500.00	\$ 550.00	Lily Rivo

Exhibit N

11/09/2023	0.5	A104 Review/analyze L310 Written Discovery	L310 Written Discovery	Review meet and confer letter to ACSO, follow up discovery requests (set two, Bolbol) to Rowell Ranch, RFAs to Rowell Ranch	\$ 720.00	\$ 360.00	Jessica Blome
11/09/2023	0.2	A104 Review/analyze L310 Written Discovery	L310 Written Discovery	Revise meet and confer letter per JB edits, review edits on discovery for updating ROGS and RFPs including definitions	\$ 500.00	\$ 100.00	Lily Rivo
11/09/2023	0.1	A106 Communicate (with client) L310 Written Discovery	L310 Written Discovery	Exchange emails with client	\$ 720.00	\$ 72.00	Jessica Blome
11/14/2023	0.4	A103 Draft/revise L310 Written Discovery	L310 Written Discovery	Review client changes to meet and confer letter for ACSO counsel, accept edits and propose comments for JB final review	\$ 500.00	\$ 200.00	Lily Rivo
11/14/2023	0.1	A105 Communicate (in firm) L310 Written Discovery	L310 Written Discovery	Exchange emails with JB regarding meet and confer letter re discovery with ACSO	\$ 500.00	\$ 50.00	Lily Rivo
11/14/2023	0.2	A103 Draft/revise L310 Written Discovery	L310 Written Discovery	Update definitions on written discovery to RRR, RFA, Set one, RFP and ROGS, Set Two	\$ 500.00	\$ 100.00	Lily Rivo
11/16/2023	0.4	A103 Draft/revise L310 Written Discovery	L310 Written Discovery	Review and finalize written discovery to RRR, including RFA, Set One, RFP and Interrogatories, Set Two	\$ 500.00	\$ 200.00	Lily Rivo
11/16/2023	0.1	A105 Communicate (in firm) L310 Written Discovery	L310 Written Discovery	Exchange email with JB regarding written discovery, question regarding RFA Set One additional requests	\$ 500.00	\$ 50.00	Lily Rivo
11/20/2023	0.3	A104 Review/analyze L310 Written Discovery	L310 Written Discovery	Review meet and confer letter for JB final review	\$ 500.00	\$ 150.00	Lily Rivo
11/21/2023	0.5	A103 Draft/revise L390 Other Discovery	L390 Other Discovery	Review/finalize draft meet and confer letter to ACSO, send to ACSO	\$ 720.00	\$ 360.00	Jessica Blome
11/21/2023	0.1	A104 Review/analyze L310 Written Discovery	L310 Written Discovery	Review RFAs, Set One for RRR, client additional requests to confirm consistency	\$ 500.00	\$ 50.00	Lily Rivo
11/21/2023	0.1	A104 Review/analyze L310 Written Discovery	L310 Written Discovery	Review correspondence between JB and counsel for ACSO, review edits to meet and confer letter	\$ 500.00	\$ 50.00	Lily Rivo
11/21/2023	0.4	A103 Draft/revise L310 Written Discovery	L310 Written Discovery	Review and revise draft written discovery to ACSO, Rowell Ranch, confer with associate re: same	\$ 720.00	\$ 288.00	Jessica Blome
11/21/2023	1.6	A103 Draft/revise L310 Written Discovery	L310 Written Discovery	Finalize all discovery, update FRCP and edits for propounding on RRR.	\$ 500.00	\$ 800.00	Lily Rivo
11/22/2023	0.4	A103 Draft/revise L310 Written Discovery	L310 Written Discovery	Update proof of service and date, finalize and propound discovery to RRR, Set One RFA, Set Two ROGS and RPDs	\$ 500.00	\$ 200.00	Lily Rivo
11/28/2023	0.1	A105 Communicate (in firm) L390 Other Discovery	L390 Other Discovery	Confer with staff re: discovery questions	\$ 720.00	\$ 72.00	Jessica Blome
11/28/2023	0.1	A107 Communicate (other outside counsel) L160 Settlement/Non-Binding ADR	L160 Settlement/Non-Binding ADR	Confer with RRR counsel, RRR counsel asks if Plaintiffs open to settlement via phonecall	\$ 500.00	\$ 50.00	Lily Rivo
11/28/2023	0.2	A103 Draft/revise L160 Settlement/Non-Binding ADR	L160 Settlement/Non-Binding ADR	Draft confirmation to RRR regarding settlement demand letter, review demand sent September 9, 2023	\$ 500.00	\$ 100.00	Lily Rivo

Exhibit N

12/04/2023	0.1	A104 Review/analyze L310 Written Discovery	L310 Written Discovery	Review HARD's response to RFP, Set One, as of 10-05-2023, counsel stating all documents had been provided by link;	\$ 500.00	\$ 50.00	Lily Rivo
12/06/2023	0.4	A104 Review/analyze L390 Other Discovery	L390 Other Discovery	Review HARD responses to RFP, Set 1, confirm no deficiencies in production, save for production of video as requested in RFP No 14	\$ 500.00	\$ 200.00	Lily Rivo
12/11/2023	0.5	A104 Review/analyze L390 Other Discovery	L390 Other Discovery	Review HARD responses to RFP, Set One, note video evidence missing, draft clio notes and f/u with client	\$ 500.00	\$ 250.00	Lily Rivo
12/12/2023	0.1	A104 Review/analyze L310 Written Discovery	L310 Written Discovery	Review discovery deadline for RRR responses to written discovery propounded by Deniz	\$ 500.00	\$ 50.00	Lily Rivo
12/12/2023	0.1	A106 Communicate (with client) L390 Other Discovery	L390 Other Discovery	Review email from County Counsel re: meet and confer call, write to co-plaintiff re: schedule for same	\$ 720.00	\$ 72.00	Jessica Blome
12/13/2023	0.1	A105 Communicate (in firm) L160 Settlement/Non-Binding ADR	L160 Settlement/Non-Binding ADR	Review JB email to clients re meeting tomorrow with County, potential settlement	\$ 500.00	\$ 50.00	Lily Rivo
12/14/2023	0.5	A108 Communicate (other external) L310 Written Discovery	L310 Written Discovery	Call with Marc Brainich, attorney for ACSO, re: discovery responses	\$ 720.00	\$ 360.00	Jessica Blome
12/14/2023	0.1	A108 Communicate (other external) L310 Written Discovery	L310 Written Discovery	Revise meet and confer email to conform to client edits, send to counsel for Alameda County	\$ 720.00	\$ 72.00	Jessica Blome
12/15/2023	0.2	A108 Communicate (other external) L390 Other Discovery	L390 Other Discovery	Review meet and confer letter from County Counsel following up on 12/14 call, confer with client and co-plaintiff re: strategy for dealing with same	\$ 720.00	\$ 144.00	Jessica Blome
12/15/2023	0.2	A104 Review/analyze L310 Written Discovery	L310 Written Discovery	Review correspondence from County regarding meet and confer, call yesterday and notes from phone log	\$ 500.00	\$ 100.00	Lily Rivo
12/15/2023	0.1	A107 Communicate (other outside counsel) L310 Written Discovery	L310 Written Discovery	Exchange email with RRR opposing counsel granting extension response	\$ 500.00	\$ 50.00	Lily Rivo
12/18/2023	0.3	A103 Draft/revise L390 Other Discovery	L390 Other Discovery	Review County letter to plaintiffs dated 12/18 and draft request for deposition, refer to local rules for discovery cut-off	\$ 500.00	\$ 150.00	Lily Rivo
12/18/2023	0.1	A106 Communicate (with client) L390 Other Discovery	L390 Other Discovery	Exchange emails with clients regarding deposition scheduling	\$ 500.00	\$ 50.00	Lily Rivo
12/18/2023	0.1	A107 Communicate (other outside counsel) L390 Other Discovery	L390 Other Discovery	Review County response to discovery request (deposition) from RRR	\$ 500.00	\$ 50.00	Lily Rivo
12/19/2023	0.6	A101 Plan and prepare for P500 Negotiation/Revision/Responses	P500 Negotiation/Revision/Responses	Update fee sheet, send recommendation to client	\$ 720.00	\$ 432.00	Jessica Blome
12/19/2023	0.1	A106 Communicate (with client) L160 Settlement/Non-Binding ADR	L160 Settlement/Non-Binding ADR	Review email exchange btwn JB and clients regarding fees and settlement, communications from opposing counsel	\$ 500.00	\$ 50.00	Lily Rivo
12/20/2023	0.1	A108 Communicate (other external) P500 Negotiation/Revision/Responses	P500 Negotiation/Revision/Responses	Email ACSO with update to fee demand	\$ 720.00	\$ 72.00	Jessica Blome
12/21/2023	0.8	A106 Communicate (with client) L390 Other Discovery	L390 Other Discovery	Call with client to discuss discovery strategy	\$ 720.00	\$ 576.00	Jessica Blome

Exhibit N

12/21/2023	1	A104 Review/analyze L310 Written Discovery	L310 Written Discovery	Analyze discovery responses, create new table for evidence review	\$ 720.00	\$ 720.00	Jessica Blome
12/22/2023	0.8	A104 Review/analyze L390 Other Discovery	L390 Other Discovery	Review audio recording from County - Houts call to Sheriff and notes from JB regarding discrepancy between alleged plan to attend rodeo and request for "detail" analyze for FA purposes	\$ 500.00	\$ 400.00	Lily Rivo
12/22/2023	0.9	A104 Review/analyze L310 Written Discovery	L310 Written Discovery	Review ROGS and update chart - review communications about the ACSO plan to attend and the EAP plan.	\$ 500.00	\$ 450.00	Lily Rivo
12/27/2023	1.8	A104 Review/analyze L310 Written Discovery	L310 Written Discovery	Review discovery (ACSO Rogs) and update chart	\$ 500.00	\$ 900.00	Lily Rivo
12/27/2023	0.5	A104 Review/analyze L310 Written Discovery	L310 Written Discovery	Review Pat draft discovery to ACSO, RFP, Set 2	\$ 500.00	\$ 250.00	Lily Rivo
12/28/2023	0.3	A103 Draft/revise L310 Written Discovery	L310 Written Discovery	Final revisions to RFP, Set 2 to County	\$ 500.00	\$ 150.00	Lily Rivo
12/28/2023	0.2	A110 Manage data/files L310 Written Discovery	L310 Written Discovery	Review propounded discovery, calendar deadlines accordingly	\$ 500.00	\$ 100.00	Lily Rivo
12/29/2023	0.1	A106 Communicate (with client) L310 Written Discovery	L310 Written Discovery	Exchange emails with clients re RFP, Set Two	\$ 500.00	\$ 50.00	Lily Rivo
01/01/2024	0.1	A105 Communicate (in firm) L310 Written Discovery	L310 Written Discovery	Exchange emails with client, co-counsel, co-plaintiff re: new discovery	\$ 720.00	\$ 72.00	Jessica Blome
01/02/2024	0.1	A106 Communicate (with client) L310 Written Discovery	L310 Written Discovery	Exchange emails with Pat approving draft RFP	\$ 500.00	\$ 50.00	Lily Rivo
01/02/2024	0.1	A110 Manage data/files L310 Written Discovery	L310 Written Discovery	Calendar deadlines for ACSO propounded discovery	\$ 500.00	\$ 50.00	Lily Rivo
01/02/2024	0.1	A104 Review/analyze L310 Written Discovery	L310 Written Discovery	Review ACSO propounded discovery due 1/29	\$ 500.00	\$ 50.00	Lily Rivo
01/02/2024	0.1	A110 Manage data/files L310 Written Discovery	L310 Written Discovery	Calendar and update deadlines per Stipulation to extend	\$ 500.00	\$ 50.00	Lily Rivo
01/02/2024	0.1	A110 Manage data/files L310 Written Discovery	L310 Written Discovery	Confirm tasked discovery deadlines	\$ 500.00	\$ 50.00	Lily Rivo
01/02/2024	0.1	A104 Review/analyze L250 Other Written Motions and Submissions	L250 Other Written Motions and Submissions	Review request for transcript from preliminary injunction hearing	\$ 720.00	\$ 72.00	Jessica Blome
01/02/2024	0.1	A106 Communicate (with client) L310 Written Discovery	L310 Written Discovery	Exchange emails with client re: additional discovery	\$ 720.00	\$ 72.00	Jessica Blome
01/03/2024	0.1	A104 Review/analyze L250 Other Written Motions and Submissions	L250 Other Written Motions and Submissions	Review court order approving stipulated change to scheduling order, confer with staff re: same	\$ 720.00	\$ 72.00	Jessica Blome
01/03/2024	0.2	A104 Review/analyze L250 Other Written Motions and Submissions	L250 Other Written Motions and Submissions	Review court order re: transcript redactions, calendar deadline, confer with client re: same	\$ 720.00	\$ 144.00	Jessica Blome
01/03/2024	0.9	A103 Draft/revise L310 Written Discovery	L310 Written Discovery	Review RFP, Set two, incorporating client suggested language and referring to RFP, Set One	\$ 500.00	\$ 450.00	Lily Rivo
01/03/2024	0.1	A106 Communicate (with client) L310 Written Discovery	L310 Written Discovery	Exchange emails with clients re RFP Set Two for the County	\$ 500.00	\$ 50.00	Lily Rivo
01/03/2024	0.4	A104 Review/analyze L310 Written Discovery	L310 Written Discovery	Review draft discovery to County, Set Two	\$ 720.00	\$ 288.00	Jessica Blome
01/03/2024	0.1	A104 Review/analyze L310 Written Discovery	L310 Written Discovery	Review changes to RFP, Set Two to ACSO per JB	\$ 500.00	\$ 50.00	Lily Rivo
01/04/2024	0.1	A106 Communicate (with client) L310 Written Discovery	L310 Written Discovery	Exchange emails with client re: edits to written discovery	\$ 720.00	\$ 72.00	Jessica Blome
01/04/2024	0.6	A103 Draft/revise L310 Written Discovery	L310 Written Discovery	Finalize and include attachment for discovery, RFP, Set Two for ACSO; redact letter	\$ 500.00	\$ 300.00	Lily Rivo

Exhibit N

01/04/2024	0.2	A110 Manage data/files L310 Written Discovery	L310 Written Discovery	Finalize RFP, Set Two to County, transmit and calendar all deadlines	\$ 500.00	\$ 100.00	Lily Rivo
01/08/2024	0.5	A104 Review/analyze L310 Written Discovery	L310 Written Discovery	Review RRR's responses to discovery, set two	\$ 720.00	\$ 360.00	Jessica Blome
01/08/2024	0.1	A108 Communicate (other external) L310 Written Discovery	L310 Written Discovery	Exchange emails with co-plaintiff re: RRR's responses to discovery, potential protective order	\$ 720.00	\$ 72.00	Jessica Blome
01/08/2024	0.1	A108 Communicate (other external) L310 Written Discovery	L310 Written Discovery	Exchange emails with opposing counsel re: RRR's responses to discovery, potential protective order	\$ 720.00	\$ 72.00	Jessica Blome
01/08/2024	0.2	A104 Review/analyze L310 Written Discovery	L310 Written Discovery	Review and sign protective order from RRR, submit to Pat for signature	\$ 500.00	\$ 100.00	Lily Rivo
01/08/2024	0.5	A102 Research L250 Other Written Motions and Submissions	L250 Other Written Motions and Submissions	Research motion for sanctions for Rowell Ranch Rodeo's perjury in discovery	\$ 720.00	\$ 360.00	Brian Colton
01/09/2024	0.3	A103 Draft/revise L350 Discovery Motions	L350 Discovery Motions	Prepare motion for sanctions against defendant Rowell Ranch Rodeo	\$ 720.00	\$ 216.00	Brian Colton
01/09/2024	0.6	A102 Research L250 Other Written Motions and Submissions	L250 Other Written Motions and Submissions	Research federal law regarding sanctions for abuse of discovery by means of perjury	\$ 720.00	\$ 432.00	Brian Colton
01/10/2024	1	A103 Draft/revise L350 Discovery Motions	L350 Discovery Motions	Prepare motion for sanctions against defendant Rowell Ranch Rodeo	\$ 720.00	\$ 720.00	Brian Colton
01/10/2024	0.9	A102 Research L250 Other Written Motions and Submissions	L250 Other Written Motions and Submissions	Research federal law regarding sanctions for abuse of discovery by means of perjury	\$ 720.00	\$ 648.00	Brian Colton
01/11/2024	1.1	A103 Draft/revise L350 Discovery Motions	L350 Discovery Motions	Prepare motion for sanctions against defendant Rowell Ranch Rodeo	\$ 720.00	\$ 792.00	Brian Colton
01/15/2024	1	A103 Draft/revise L350 Discovery Motions	L350 Discovery Motions	Prepare motion for sanctions against defendant Rowell Ranch Rodeo	\$ 720.00	\$ 720.00	Brian Colton
01/16/2024	0.7	A103 Draft/revise L350 Discovery Motions	L350 Discovery Motions	Prepare motion for sanctions against defendant Rowell Ranch Rodeo	\$ 720.00	\$ 504.00	Brian Colton
01/16/2024	0.8	A103 Draft/revise L310 Written Discovery	L310 Written Discovery	Edit draft discovery response from Pat (RFA) to County, Set Two	\$ 500.00	\$ 400.00	Lily Rivo
01/17/2024	0.4	A103 Draft/revise L350 Discovery Motions	L350 Discovery Motions	Prepare proposed order for motion for sanctions against defendant Rowell Ranch Rodeo	\$ 720.00	\$ 288.00	Brian Colton
01/17/2024	0.5	A102 Research L350 Discovery Motions	L350 Discovery Motions	Research basis for motion for sanctions against defendant Rowell Ranch Rodeo	\$ 720.00	\$ 360.00	Brian Colton
01/17/2024	1.1	A103 Draft/revise L350 Discovery Motions	L350 Discovery Motions	Prepare motion for sanctions against defendant Rowell Ranch Rodeo	\$ 720.00	\$ 792.00	Brian Colton
01/17/2024	0.4	A103 Draft/revise L350 Discovery Motions	L350 Discovery Motions	Prepare declaration of Jessica Blome in support of motion for sanctions against defendant Rowell Ranch Rodeo	\$ 720.00	\$ 288.00	Brian Colton
01/17/2024	0.5	A103 Draft/revise L250 Other Written Motions and Submissions	L250 Other Written Motions and Submissions	Prepare meet and confer letter to counsel for Rowell Ranch Rodeo, Inc and required by local rule	\$ 720.00	\$ 360.00	Brian Colton
01/17/2024	0.6	A104 Review/analyze L310 Written Discovery	L310 Written Discovery	Review and revise discovery responses to ACSO from Plaintiffs	\$ 500.00	\$ 300.00	Lily Rivo
01/18/2024	3.8	A103 Draft/revise L350 Discovery Motions	L350 Discovery Motions	Prepare motion for sanctions against defendant Rowell Ranch Rodeo	\$ 720.00	\$ 2,736.00	Brian Colton

Exhibit N

01/18/2024	1.1	A103 Draft/revise L350 Discovery Motions	L350 Discovery Motions	Prepare declaration of Jessica Blome and exhibits thereto in support of motion for sanctions against defendant Rowell Ranch Rodeo	\$ 720.00	\$ 792.00	Brian Colton
01/18/2024	0.5	A103 Draft/revise L310 Written Discovery	L310 Written Discovery	Review RFA responses to ACSO and edit, draft objections as appropriate	\$ 500.00	\$ 250.00	Lily Rivo
01/19/2024	0.8	A103 Draft/revise L310 Written Discovery	L310 Written Discovery	Draft and revise written discovery response to ACSO	\$ 500.00	\$ 400.00	Lily Rivo
01/19/2024	2.6	A103 Draft/revise L310 Written Discovery	L310 Written Discovery	Draft HARD discovery responses including to Special ROGS, RFPs, re-format	\$ 500.00	\$ 1,300.00	Lily Rivo
01/19/2024	0.1	A105 Communicate (in firm) L310 Written Discovery	L310 Written Discovery	Exchange emails with LR re: document production plan	\$ 720.00	\$ 72.00	Jessica Blome
01/19/2024	0.4	A103 Draft/revise L310 Written Discovery	L310 Written Discovery	Draft supplemental response to RRR Interrog, Set One	\$ 500.00	\$ 200.00	Lily Rivo
01/19/2024	0.2	A104 Review/analyze L310 Written Discovery	L310 Written Discovery	Final review of draft discovery, HARD Set One, ACSO, Set Two before submitting to JB review	\$ 500.00	\$ 100.00	Lily Rivo
01/23/2024	0.7	A104 Review/analyze L310 Written Discovery	L310 Written Discovery	Review draft discovery responses to ACSO, provide feedback to associate re: same	\$ 720.00	\$ 504.00	Jessica Blome
01/23/2024	0.6	A104 Review/analyze L310 Written Discovery	L310 Written Discovery	Review draft responses to HARD discovery, confer with associate re: same	\$ 720.00	\$ 432.00	Jessica Blome
01/23/2024	3.2	A103 Draft/revise L310 Written Discovery	L310 Written Discovery	Finalize discovery responses and send to client for review, HARD and ACSO responses	\$ 500.00	\$ 1,600.00	Lily Rivo
01/24/2024	1	A103 Draft/revise L310 Written Discovery	L310 Written Discovery	Research and draft objections per client instruction, send proposed objection to client and LR for inclusion in written discovery responses	\$ 720.00	\$ 720.00	Jessica Blome
01/24/2024	2.3	A103 Draft/revise L250 Other Written Motions and Submissions	L250 Other Written Motions and Submissions	Revise draft motion for sanctions, send comments back to BC for preparation of second draft	\$ 720.00	\$ 1,656.00	Jessica Blome
01/24/2024	1.4	A103 Draft/revise L310 Written Discovery	L310 Written Discovery	Revise discovery per client communication and JB suggested objections and edits.	\$ 500.00	\$ 700.00	Lily Rivo
01/24/2024	0.6	A103 Draft/revise L350 Discovery Motions	L350 Discovery Motions	Revise motion for sanctions based on partner feedback	\$ 720.00	\$ 432.00	Brian Colton
01/25/2024	0.2	A103 Draft/revise L310 Written Discovery	L310 Written Discovery	Update draft HARD discovery and send to client for final review	\$ 500.00	\$ 100.00	Lily Rivo
01/25/2024	2.3	A102 Research L250 Other Written Motions and Submissions	L250 Other Written Motions and Submissions	Research basis for motion for sanctions absent discovery order or Rule 37 basis	\$ 720.00	\$ 1,656.00	Brian Colton
01/25/2024	0.3	A103 Draft/revise L310 Written Discovery	L310 Written Discovery	Finalize responses to HARD discovery per client edits/feedback	\$ 500.00	\$ 150.00	Lily Rivo
01/25/2024	2.1	A103 Draft/revise L350 Discovery Motions	L350 Discovery Motions	Revise motion for sanctions based on partner feedback	\$ 720.00	\$ 1,512.00	Brian Colton
01/25/2024	0.8	A103 Draft/revise L350 Discovery Motions	L350 Discovery Motions	Revise declaration of Jessica Blome in support motion for sanctions	\$ 720.00	\$ 576.00	Brian Colton
01/25/2024	0.3	A103 Draft/revise L310 Written Discovery	L310 Written Discovery	Finalize and submit HARD disco responses to counsel	\$ 500.00	\$ 150.00	Lily Rivo
01/25/2024	0.1	A105 Communicate (in firm) L310 Written Discovery	L310 Written Discovery	Confer with LR regarding HARD discovery responses	\$ 720.00	\$ 72.00	Jessica Blome
01/26/2024	0.3	A103 Draft/revise L310 Written Discovery	L310 Written Discovery	Finalize and transmit Supplemental Response to RRR ROGS	\$ 500.00	\$ 150.00	Lily Rivo

Exhibit N

01/26/2024	0.1	A105 Communicate (in firm) L250 Other Written Motions and Submissions	L250 Other Written Motions and Submissions	Exchange emails with associate re: status of motion for sanctions	\$ 720.00	\$ 72.00	Jessica Blome
01/26/2024	0.3	A103 Draft/revise L350 Discovery Motions	L350 Discovery Motions	Revise declaration of Jessica Blome in support motion for sanctions	\$ 720.00	\$ 216.00	Brian Colton
01/26/2024	4.1	A103 Draft/revise L350 Discovery Motions	L350 Discovery Motions	Revise motion for sanctions based on partner feedback	\$ 720.00	\$ 2,952.00	Brian Colton
01/26/2024	1.1	A103 Draft/revise L310 Written Discovery	L310 Written Discovery	Prepare and finalize discovery responses to ACSO, Set Two, confirm objections identical, respond.	\$ 500.00	\$ 550.00	Lily Rivo
01/26/2024	1.2	A104 Review/analyze L350 Discovery Motions	L350 Discovery Motions	Review of draft motion for sanctions	\$ 720.00	\$ 864.00	Rae Lovko
01/26/2024	0.1	A105 Communicate (in firm) L250 Other Written Motions and Submissions	L250 Other Written Motions and Submissions	Confer with associate re: motion for sanctions	\$ 720.00	\$ 72.00	Jessica Blome
01/27/2024	1.8	A102 Research L350 Discovery Motions	L350 Discovery Motions	Research on basis for motion for sanctions	\$ 720.00	\$ 1,296.00	Rae Lovko
01/27/2024	1.1	A103 Draft/revise L350 Discovery Motions	L350 Discovery Motions	Edit introduction and facts re motion for sanctions; edit Blome Declaration	\$ 720.00	\$ 792.00	Rae Lovko
01/27/2024	2.2	A103 Draft/revise L350 Discovery Motions	L350 Discovery Motions	Edit argument and caselaw in motion for sanctions	\$ 720.00	\$ 1,584.00	Rae Lovko
01/28/2024	0.3	A104 Review/analyze L350 Discovery Motions	L350 Discovery Motions	Review BC 1st draft of sanctions motion	\$ 720.00	\$ 216.00	Rae Lovko
01/30/2024	0.6	A103 Draft/revise L250 Other Written Motions and Submissions	L250 Other Written Motions and Submissions	Revise draft motion for sanctions, send to clients for review/approval	\$ 720.00	\$ 432.00	Jessica Blome

Original Total	\$56,507.00
-----------------------	--------------------

With Revisions	\$45,029.00
-----------------------	--------------------